Michael Rosenthal, WSB #5-2099 Nathan Nicholas, WSB #7-5078 Hathaway & Kunz, LLP P.O. Box 1208 Cheyenne, WY 82003-1208 (307) 634-7723 Fax: (307) 634-0985 mike@hkwyolaw.com nnicholas@hkwyolaw.com

Brice M. Timmons (TN Bar #29582)
Bryce Ashby (TN Bar #026179)
Craig Edgington (TN Bar #038205)
Admitted Pro Hac Vice
Donati Law, PLLC
1545 Union Ave.
Memphis, TN 38104
(901) 209-5500
Fax: (901) 278-3111
brice@donatilaw.com
bryce@donatilaw.com
craig@donatilaw.com

Frank L. Watson, III (TN Bar #015073)

Admitted Pro Hac Vice

Watson Burns, PLLC

253 Adams Avenue

Memphis, TN 38104

(901) 529-7996

Fax: (901) 529-7998

fwatson@watsonburns.com

ATTORNEYS FOR PLAINTIFFS

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

CARLIE SHERMAN, ANNA GOZUN, AMANDA NASH, ANDREW SCAVUZZO, and EHAN JELINEK, on behalf of)
themselves and all similarly situated persons,	
PLAINTIFFS,)
v.) Case No. 20-CV-215-S
TRINITY TEEN SOLUTIONS, INC., a Wyoming)
corporation; TRIANGLE CROSS RANCH, LLC, a Wyoming)
limited liability corporation; MONKS OF THE MOST)
BLESSED VIRGIN MARY OF MOUNT CARMEL, d/b/a	
MYSTIC MONK COFFEE, a Wyoming corporation;)
GERALD E. SCHNEIDER; MICHAELEEN P.)
SCHNEIDER; ANGELA C. WOODWARD; JERRY D.)

SCHNEIDER; MARK SCHNEIDER; KARA WOODWARD; KYLE WOODWARD; THOMAS GEORGE; JUDITH D. JEFFERIS; DALLY-UP, LLC, a
CEODCE, HIDITH D. LEEEEDIS, DALLY HD. LLC.
GEORGE; JUDITH D. JEFFERIS; DALLY-UP, LLC, a
Wyoming limited liability corporation; ROCK CREEK
RANCH, INC., a Delaware corporation; DIOCESE OF
CHEYENNE, a Wyoming corporation; the SOCIETY OF
OUR LADY OF THE MOST HOLY TRINITY , a Texas
corporation; and the NEW MOUNT CARMEL
FOUNDATION, INC. , a Wyoming corporation,
)
DEFENDANTS.

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' VARIOUS MOTIONS TO DISMISS

Plaintiffs, by and through undersigned counsel, pursuant to Local Rule 6.1(e), respectfully submit this Unopposed Motion for Extension of Time to Respond to Defendants' various Motions to Dismiss and supporting memoranda and affidavits [Nos. 120-132], up through and including to May 7, 2021, and advise the Court as follows:

- 1. Undersigned counsel have conferred with the defense counsel regarding the requested relief, and Defendants do not oppose the extension requested.
- 2. This is the first extension requested by Plaintiffs to respond to the various Motions to Dismiss and supporting documents [Nos. 120-132].
- 3. Plaintiffs did not oppose the Defendants' Motion for Extension of Time to Respond to the First Amended Complaint [No. 115], which was granted by the Court [No. 116].
- 4. Based on the foregoing, Plaintiffs request an extension to time up to and including May 7, 2021, to respond to the Defendants' Motions to Dismiss and supporting documents.

5. No party will be prejudiced by the relief requested herein.

WHEREFORE, Plaintiffs respectfully request that this Court grant an extension of time until May 7, 2021, to respond to Defendants' Motions to Dismiss.

DATED this 6th day of April, 2021.

Carlie Sherman, Anna Gozun, Amanda Nash, Andrew Scavuzzo, and Ehan Jelinek, on behalf of themselves and all similarly situated persons, PLAINTIFFS

By: /s/ Michael Rosenthal

Michael Rosenthal, WSB #5-2099 Nathan Nicholas, WSB #7-5078 Hathaway & Kunz, LLP P.O. Box 1208 Cheyenne, WY 82003-1208 (307) 634-7723 Fax: (307) 634-0985

mike@hkwyolaw.com nnicholas@hkwyolaw.com

Brice M. Timmons (TN Bar #29582) Bryce Ashby (TN Bar #026179) Craig Edgington (TN Bar #038205) Admitted Pro Hac Vice Donati Law, PLLC 1545 Union Ave. Memphis, TN 38104 (901) 209-5500 Fax: (901) 278-3111

brice@donatilaw.com bryce@donatilaw.com craig@donatilaw.com

Frank L. Watson, III (TN Bar #015073) Admitted Pro Hac Vice Watson Burns, PLLC 253 Adams Avenue Memphis, TN 38104 (901) 529-7996 Fax: (901) 529-7998

ATTORNEYS FOR PLAINTIFFS AND PUTATIVE CLASS MEMBERS

fwatson@watsonburns.com

CERTIFICATE OF SERVICE

This is to certify that on the 6th day of April, 2021, a true and correct copy of the foregoing was served upon counsel as follows:

SCHWARTZ, BON, WALKER & STUDER, LLC 141 South Center Street, Suite 500 Casper, WY 82601	[x] CM/ECF [] U.S. Mail [] Fax: (307) 234-5099 [] E-mail: <u>rick@schwartzbon.com</u>
Patricia K. Buchanan Patterson Buchanan Fobes & Leitch, Inc., P.S. 1000 Second Ave., 30th Floor Seattle, WA 98104	 [x] CM/ECF [] U.S. Mail [] Fax: [] E-mail: pkb@pattersonbuchanan.com
Thomas Quinn Lillian L. Alves GORDON REES SCULLY MANSUKHANI, LLP 555 Seventeenth Street, Suite 3400 Denver, CO 80202	 [x] CM/ECF [] U.S. Mail [] Fax: (303) 534-5161 [] E-mail: tquinn@grsm.com lalves@grsm.com
Lindsey M. Romano Gordon Rees Scully Mansukhani, LLP 275 Battery Street, Suite 200 San Francisco, CA 94111	[x] CM/ECF [] U.S. Mail [] Fax: [] E-mail: lromano@grsm.com

Paul J. Hickey Loyd E. Smith HICKEY & EVANS, LLP 1800 Carey Avenue, Suite 700 P.O. Box 467 Cheyenne, WY 82003-0467	 [x] CM/ECF [] U.S. Mail [] Fax: (307) 638-7335 [] E-mail: phickey@hickeyevans.com lsmith@hickeyevans.com
Jane M. France SUNDAHL, POWERS, KAPP & MARTIN, LLC 1725 Carey Avenue P.O. Box 328 Cheyenne, WY 82003	[x] CM/ECF [] U.S. Mail [] Fax: (307) 632-7216 [] E-mail: jfrance@spkm.org
Makenna J. Stoakes, Patrick J. Sodoro Sodoro, Mooney, Lenaghan 13924 God Circle Omaha, NE 68144	<pre>[x] CM/ECF [] U.S. Mail [] Fax: [] E-mail:</pre>
Monty L. Barnett Rachel E. Ryckman Keith R. Olivera John C. Matthews WHITE AND STEELE, P.C. Dominion Towers, North Tower 600 17th Street, Suite 600N Denver, CO 80202-5406	 [x] CM/ECF [] U.S. Mail [] Fax: [] E-mail: mbarnett@wsteele.com
Traci L. Lacock, Hirst Applegate, LLP P.O. Box 1083 Cheyenne, WY 82003-1083	[x] CM/ECF [] U.S. Mail [] Fax: (307) 632-4999 [] E-mail:

Mara Cohara Brian Fries Lathrop GPM LLP 2345 Grand Blvd., Suite 2200 Kansas City, MO 64108-2618	 [x] CM/ECF [] U.S. Mail [] Fax: [] E-mail: mara.cohara@lathropgpm.com brianfries@lathropgpm.com
Zenith Ward Buchhammer & Ward, P.C. 1821 Logan Avenue P.O. Box 568 Cheyenne, WY 82003-0568	[x] CM/ECF [] U.S. Mail [] Fax: (307) 634-2199 [] E-mail: <u>zsw@wyoming.com</u>
	/s/ Michael Rosenthal